

EXHIBIT C

From: Pernick, John D. <john.pernick@bingham.com>
Sent: Tuesday, July 12, 2011 1:04 PM
To: Joseph P. Guglielmo; 'emattson@sidley.com'; 'matthew.jackson@sidley.com'
Cc: 'JDEVORE@cohenmilstein.com'; Hal Cunningham; 'drehns@cohenmilstein.com'; 'clometti@cohenmilstein.com'; You, Jee Young; Hoffman, Susan
Subject: RE: In re Washington Mutual Mortgage Backed Securities Litigation

Joe,

It is looking like the document production may not be complete until the first or second week of August. I am still working on getting a final estimate (we are adding reviewers this week and I need to see how that impacts the timing).

In the meantime, do you have any firm depo dates for any of the witnesses you subpoenaed. Given that the production of documents from WMB is farther along, it may make sense to do those first if we can get them set.

John

From: Joseph P. Guglielmo [<mailto:jguglielmo@scott-scott.com>]
Sent: Wednesday, July 06, 2011 5:06 PM
To: Pernick, John D.; 'emattson@sidley.com'; 'matthew.jackson@sidley.com'
Cc: 'JDEVORE@cohenmilstein.com'; Hal Cunningham; 'drehns@cohenmilstein.com'; 'clometti@cohenmilstein.com'
Subject: Re: In re Washington Mutual Mortgage Backed Securities Litigation

Thanks John.

From: Pernick, John D. <john.pernick@bingham.com>
To: Joseph P. Guglielmo; Mattson, Eric <emattson@sidley.com>; Jackson, Matthew <matthew.jackson@sidley.com>
Cc: JDEVORE@cohenmilstein.com <JDEVORE@cohenmilstein.com>; Hal Cunningham; drehns@cohenmilstein.com <drehns@cohenmilstein.com>; clometti@cohenmilstein.com <clometti@cohenmilstein.com>
Sent: Wed Jul 06 19:15:24 2011
Subject: RE: In re Washington Mutual Mortgage Backed Securities Litigation

Joe,

I am starting to hear that the universe of documents is larger than we first thought (by at least 30,000 documents). I will get final numbers tomorrow. I really want to get this done by the end of July so will work with the client to see if we can expedite the process (and keep with that schedule), but I just wanted to keep you updated on my info. Let's see where we are at the end of this week. In the meantime, I will make sure that Ms. Hebble holds open the second week of August for us.

John

From: Joseph P. Guglielmo [<mailto:jguglielmo@scott-scott.com>]
Sent: Wednesday, July 06, 2011 4:12 PM
To: Pernick, John D.; Mattson, Eric; Jackson, Matthew
Cc: JDEVORE@cohenmilstein.com; Hal Cunningham; drehns@cohenmilstein.com; clometti@cohenmilstein.com
Subject: RE: In re Washington Mutual Mortgage Backed Securities Litigation

It appears that it should in light of your representations on the document production. If the production time line slips, we can discuss a further extension.

From: Pernick, John D. [<mailto:john.pernick@bingham.com>]
Sent: Wednesday, July 06, 2011 4:19 PM
To: Joseph P. Guglielmo; Mattson, Eric; Jackson, Matthew
Cc: JDEVORE@cohenmilstein.com; Hal Cunningham; drehns@cohenmilstein.com; clometti@cohenmilstein.com
Subject: RE: In re Washington Mutual Mortgage Backed Securities Litigation

Joe,

We are working with the goal of completing the production of the WCC documents that are currently being reviewed by the end of July, with a rolling production that will begin either at the end of this week or early next week. With that schedule, I think setting Helaine Hebble's 30(b)(6) deposition for the week of August 8 makes sense. I am out the last two weeks of August, so if you would prefer something later, then we could do early September (though I have not checked with Helaine on her availability that late, I know she is available the first two weeks of August).

If the second week of August works with your time frame, I will get you a specific date.

John

From: Joseph P. Guglielmo [<mailto:jguglielmo@scott-scott.com>]
Sent: Tuesday, July 05, 2011 1:58 PM
To: Pernick, John D.; Mattson, Eric; Jackson, Matthew
Cc: JDEVORE@cohenmilstein.com; Hal Cunningham; drehns@cohenmilstein.com; clometti@cohenmilstein.com
Subject: RE: In re Washington Mutual Mortgage Backed Securities Litigation

Ok, just let us know when you will be available to discuss. Thanks

From: Pernick, John D. [<mailto:john.pernick@bingham.com>]
Sent: Tuesday, July 05, 2011 4:55 PM
To: Joseph P. Guglielmo; Mattson, Eric; Jackson, Matthew
Cc: JDEVORE@cohenmilstein.com; Hal Cunningham; drehns@cohenmilstein.com; clometti@cohenmilstein.com
Subject: RE: In re Washington Mutual Mortgage Backed Securities Litigation

Joe,

I am getting an update on the status of the WCC production this evening that will give me at least some basis for an estimate as to when the production will be complete, I will get you that info tomorrow and, based on that info, will work on getting alternate deposition dates.

John

From: Joseph P. Guglielmo [<mailto:jguglielmo@scott-scott.com>]
Sent: Tuesday, July 05, 2011 12:04 PM
To: Pernick, John D.; Mattson, Eric; Jackson, Matthew
Cc: JDEVORE@cohenmilstein.com; Hal Cunningham; drehns@cohenmilstein.com; clometti@cohenmilstein.com
Subject: RE: In re Washington Mutual Mortgage Backed Securities Litigation

John, following up on your suggestion to push back the 30(b)(6) deposition, we are amenable to moving the deposition a few weeks, can you provide us a more specific proposal on production of documents re: WCC and some revised dates? Thanks.

From: Pernick, John D. [<mailto:john.pernick@bingham.com>]
Sent: Friday, July 01, 2011 6:11 PM
To: Joseph P. Guglielmo; Mattson, Eric; Jackson, Matthew
Cc: JDEVORE@cohenmilstein.com; Hal Cunningham; drehns@cohenmilstein.com; clometti@cohenmilstein.com
Subject: RE: In re Washington Mutual Mortgage Backed Securities Litigation

Following up on our call today, Defendants will agree to move the date for Plaintiffs' opposition to Defendants' motion for judgment on the pleadings to July 27, the due date for Plaintiffs' reply re the motion for class certification if Plaintiffs will agree that the deadline for Defendants' reply re the motion for judgment on the pleadings is August 3.

John

From: Joseph P. Guglielmo [<mailto:jguglielmo@scott-scott.com>]
Sent: Wednesday, June 29, 2011 12:02 PM
To: Mattson, Eric; Jackson, Matthew; Pernick, John D.
Cc: JDEVORE@cohenmilstein.com; Hal Cunningham; drehns@cohenmilstein.com; clometti@cohenmilstein.com
Subject: RE: In re Washington Mutual Mortgage Backed Securities Litigation

yes, let's use this dial in:

- USA Toll-Free: (877)402-9753
- USA Caller Paid/International Toll : (636)651-3141
- ACCESS CODE: 8964186

From: Mattson, Eric [<mailto:emattson@Sidley.com>]
Sent: Wednesday, June 29, 2011 2:51 PM
To: Joseph P. Guglielmo; Jackson, Matthew; Pernick, John D.
Cc: JDEVORE@cohenmilstein.com; Hal Cunningham; drehns@cohenmilstein.com; clometti@cohenmilstein.com
Subject: RE: In re Washington Mutual Mortgage Backed Securities Litigation

Sorry, can we make it 1 Central?

From: Joseph P. Guglielmo [<mailto:jguglielmo@scott-scott.com>]

Sent: Wednesday, June 29, 2011 1:33 PM

To: Jackson, Matthew; Pernick, John D.

Cc: JDEVORE@cohenmilstein.com; Hal Cunningham; drehns@cohenmilstein.com; clometti@cohenmilstein.com; Mattson, Eric

Subject: RE: In re Washington Mutual Mortgage Backed Securities Litigation

ok, that works.

From: Jackson, Matthew [<mailto:matthew.jackson@sidley.com>]

Sent: Wednesday, June 29, 2011 1:48 PM

To: Joseph P. Guglielmo; Pernick, John D.

Cc: JDEVORE@cohenmilstein.com; Hal Cunningham; drehns@cohenmilstein.com; clometti@cohenmilstein.com; Mattson, Eric

Subject: RE: In re Washington Mutual Mortgage Backed Securities Litigation

Joe, I won't be free until 12:00 central, but I am free anytime after that.

Matt Jackson

312.853.0630

From: Joseph P. Guglielmo [<mailto:jguglielmo@scott-scott.com>]

Sent: Wednesday, June 29, 2011 12:41 PM

To: Jackson, Matthew; Pernick, John D.

Cc: JDEVORE@cohenmilstein.com; Hal Cunningham; drehns@cohenmilstein.com; clometti@cohenmilstein.com; Mattson, Eric

Subject: RE: In re Washington Mutual Mortgage Backed Securities Litigation

Matt, can we talk on friday at 11am?

From: Jackson, Matthew [<mailto:matthew.jackson@sidley.com>]

Sent: Tuesday, June 28, 2011 10:48 AM

To: Joseph P. Guglielmo; Pernick, John D.

Cc: JDEVORE@cohenmilstein.com; Hal Cunningham; drehns@cohenmilstein.com; clometti@cohenmilstein.com; Mattson, Eric

Subject: RE: In re Washington Mutual Mortgage Backed Securities Litigation

Joe, I can tell you that (a) Chase has been working diligently on this and (b) we expect to be able to give an update to you on Friday. As you know the volume of documents we are dealing with is very large.

Matt Jackson

Sidley Austin LLP

One South Dearborn, Chicago, Illinois, 60603

Tel: (312)853-0630 Fax: (312) 853-7036

matthew.jackson@sidley.com

From: Joseph P. Guglielmo [<mailto:jguglielmo@scott-scott.com>]

Sent: Monday, June 27, 2011 6:08 PM

To: Jackson, Matthew; Pernick, John D.

Cc: JDEVORE@cohenmilstein.com; Hal Cunningham; drehns@cohenmilstein.com; clometti@cohenmilstein.com; Mattson, Eric

Subject: RE: In re Washington Mutual Mortgage Backed Securities Litigation

Matt, please provide an update. At this point, we need to move to compel this production.

From: Jackson, Matthew [<mailto:matthew.jackson@sidley.com>]

Sent: Tuesday, June 07, 2011 3:45 PM

To: Joseph P. Guglielmo; Pernick, John D.

Cc: JDEVORE@cohenmilstein.com; Hal Cunningham; drehns@cohenmilstein.com; clometti@cohenmilstein.com; Mattson, Eric

Subject: RE: In re Washington Mutual Mortgage Backed Securities Litigation

As to the loan file production, I do not yet have much more to add to my update provided on 6/1/2011. I have been told that the loan files have finished loading and QC of the files is underway. I have requested a further update from the vendor.

Matt Jackson

Sidley Austin LLP

One South Dearborn, Chicago, Illinois, 60603

Tel: (312)853-0630 Fax: (312) 853-7036

matthew.jackson@sidley.com

From: Joseph P. Guglielmo [<mailto:jguglielmo@scott-scott.com>]

Sent: Tuesday, June 07, 2011 12:10 PM

To: Pernick, John D.; Jackson, Matthew; Mattson, Eric

Cc: 'JDEVORE@cohenmilstein.com'; Hal Cunningham; 'drehns@cohenmilstein.com'; 'clometti@cohenmilstein.com'

Subject: RE: In re Washington Mutual Mortgage Backed Securities Litigation

John, any update on deposition location and/or witnesses? Also, what is the status of WCC docs. Eric, do you have any update on the loan file production?

From: Pernick, John D. [<mailto:john.pernick@bingham.com>]

Sent: Wednesday, June 01, 2011 4:06 PM

To: Joseph P. Guglielmo; 'matthew.jackson@sidley.com'; 'emattson@sidley.com'

Cc: 'JDEVORE@cohenmilstein.com'; Hal Cunningham; 'drehns@cohenmilstein.com'; 'clometti@cohenmilstein.com'

Subject: RE: In re Washington Mutual Mortgage Backed Securities Litigation

30(b)(6) will be in NY. Hoping to get an update re the WCC docs in the next day or so, which will give me a time frame for educating the witness.

From: Joseph P. Guglielmo [<mailto:jguglielmo@scott-scott.com>]

Sent: Wednesday, June 01, 2011 11:37 AM

To: 'matthew.jackson@sidley.com'; 'emattson@sidley.com'; Pernick, John D.

Cc: 'JDEVORE@cohenmilstein.com'; Hal Cunningham; 'drehns@cohenmilstein.com'; 'clometti@cohenmilstein.com'

Subject: Re: In re Washington Mutual Mortgage Backed Securities Litigation

Matt and John, can you provide an update on the loan file production?

Also, John, do you have any proposed dates/locations for the 30(b)(6) deposition?

From: Jackson, Matthew <matthew.jackson@sidley.com>

To: Joseph P. Guglielmo; Mattson, Eric <emattson@sidley.com>; Pernick, John D. <john.pernick@bingham.com>

Cc: Devore, Joshua <JDEVORE@cohenmilstein.com>; Hal Cunningham; Rehns, Daniel <drehns@cohenmilstein.com>; Lometti, Christopher <clometti@cohenmilstein.com>

Sent: Fri May 27 15:07:53 2011

Subject: RE: In re Washington Mutual Mortgage Backed Securities Litigation

Joseph, please see below for an update on Chase's custodial productions. As to the partially produced custodians for which we are verifying and supplementing custodial data (where necessary), I have asked that we expedite the supplemental collections of Jurgens, Drastal and Hebble. Regarding Hebble, I know we only had a very small number of documents that hit on your search terms in our most recent production, so we expect the supplemental data we receive for her to be significant. I cannot yet provide guidance on when all collections will be completed and processed, but I will keep you informed.

Custodial data productions completed:

Cynthia	Abercombie
Mark	Brown
David	Beck
Tom	Casey
Cathy L.	Doperalski
Cheryl	Feltgen
Stephen	Fortunato
Juanita	Gephardt
Arlene	Hyde
Randy	Melby
Charles	Mortensen
Tim	Pihl
John	Robinson
Clifford	Rossi
Steve	Rotella
David	Schneider
Maureen	Shafer
June	Thoreson-Rogers
Ann	Tierney
Bridgette	Timberlake

James Jay	Vanasek Weisbrod
Don	White

Custodial data produced but supplementing / verifying data sets.

Todd	Baker
Hugh	Boyle
Richard	Careaga
Ron	Cathcart
Youyi	Chen
Michael D.	Coyne
John	Drastal
Helaine	Hebble
Karen A.	Holbrook
Mark	Hillis
Rolland	Jurgens
Kerry	Killinger
Tom	Lehman
Tim	Maimone
Richard	McCoppin
Michael	Parker
Doug	Potolsky
Mahwish	Rasheed
Richard	Stephenson

Custodial data is being collected, not yet produced:

Michael	Aaknes
Cleo	Coman
Scott	Edwards
Lisa	Fogo
Todd	Hanssen
Scott	Hitchcock
Gary	Hunter
Dennis	Lai
Tom	Lazar
Barbara	Lilly
Barbara	Loper
Rob	Marone
Kevin	Seidl
Vinnie	Varca
Diane	Novak
Thomas	Green
Donald	Wilhelm

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From: Joseph P. Guglielmo [<mailto:jguglielmo@scott-scott.com>]

Sent: Friday, May 27, 2011 1:14 PM

To: Mattson, Eric; Pernick, John D.; Jackson, Matthew

Cc: Devore, Joshua; Hal Cunningham; Rehns, Daniel; Lometti, Christopher

Subject: RE: In re Washington Mutual Mortgage Backed Securities Litigation

ok, thanks.

From: Mattson, Eric [<mailto:emattson@Sidley.com>]

Sent: Friday, May 27, 2011 2:12 PM
To: Joseph P. Guglielmo; Pernick, John D.; Jackson, Matthew
Cc: Devore, Joshua; Hal Cunningham; Rehns, Daniel; Lometti, Christopher
Subject: RE: In re Washington Mutual Mortgage Backed Securities Litigation

I will defer to Matt with respect to Chase's production. Also, please copy Matt on future e-mails.

From: Joseph P. Guglielmo [<mailto:jguglielmo@scott-scott.com>]
Sent: Friday, May 27, 2011 9:52 AM
To: Mattson, Eric; Pernick, John D.
Cc: Devore, Joshua; Hal Cunningham; Rehns, Daniel; Lometti, Christopher
Subject: In re Washington Mutual Mortgage Backed Securities Litigation

Eric and John, can you please provide an update on the custodial production and identify which custodian's production is complete? Thanks.



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